# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN

SIERRA CLUB,	)
Plaintiff, v.	) Case No. 1:11-cv-00071 ) Hon. Paul L. Maloney
CITY OF HOLLAND and HOLLAND BOARD OF PUBLIC WORKS,	) ) )
Defendants.	)

DECLARATION OF DAVID C. BENDER IN SUPPORT OF PLAINTIFF'S SECOND MOTION FOR PARTIAL SUMMARY JUDGMENT REGARDING DEFENDANTS' LIABILITY FOR OPACITY VIOLATIONS

## **EXHIBIT F:**

Relevant Portions of Defendants' Quarterly Opacity Excess Emissions Reports (2009)



Holland **Board** of Public Works

April 2, 2009

Certified Mail - Return Receipt Requested

625 Hastings Avenue Holland, MI 49423

Mr. Steve LaChance Michigan Department of Environmental Quality

www.hollandbpw.com

Air Quality Division State Office Building

Telephone

350 Ottawa NW

(616) 355-1520

Grand Rapids, MI 49503

Facsimile (616) 355-1550

Dear Mr. LaChance:

Attached are the Excess Emissions Summary Reports and Detail Reports for Units 3, 4, and 5 of the James De Young Generating Station for the 1st quarter of 2009.

If you have any questions, please do not hesitate to call me at 616-355-1210.

Sincerely,

Judy N. Visscher

Environmental Regulatory Specialist

Ms. Bonnie Bush, USEPA-Region V (Summary Report only) copy to:

Mr. Jon M. Wilford, MDEQ-CSU, Lansing

Community Owned Utility

Electricity

Water

Waste Treatment





MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

## RENEWABLE OPERATING PERMIT REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division

upon request.			
Source Name HBPW James DeYoung Generation	1 Station & WWTP	County Ottawa	
Source Address 64 Pine Avenue & 42 South R	iver Avenue	City Holland	
AQD Source ID (SRN) B2357	ROP No. MI-ROP-B2357- 2006a	ROP Section No. 0	1 & 02
Please check the appropriate box(es):			
Annual Compliance Certification (Pursuant to R	ule 213(4)(c))	•	
Reporting period (provide inclusive dates): From  1. During the entire reporting period, this source term and condition of which is identified and include method(s) specified in the ROP.	was in compliance with ALL term led by this reference. The metho	od(s) used to determine compliar	nce is/are the
2. During the entire reporting period this source term and condition of which is identified and included deviation report(s). The method used to determine unless otherwise indicated and described on the entire terms.	uded by this reference, EXCEP1 ne compliance for each term and	for the deviations identified on	the enclosed
Semi-Annual (or More Frequent) Report Certification	ation (Pursuant to Rule 213(3)	(c))	
Reporting period (provide inclusive dates): From  1. During the entire reporting period, ALL monitor deviations from these requirements or any other to 2. During the entire reporting period, all monitoring deviations from these requirements or any other to enclosed deviation report(s).	oring and associated recordkeeping are conditions occurred.	requirements in the ROP were r	met and no
○ Other Report Certification			
Reporting period (provide inclusive dates): From Additional monitoring reports or other applicable doc Quarterly Excess Emissions and Monito	cuments required by the ROP are	3/31/09 e attached as described:	
I certify that, based on information and belief formed a	after reasonable inquiry, the sta	atements and information in this	report and th
supporting enclosures are true, accurate and complete	ator rougeriable inquity, the etc		•
David G. Koster	Operations Dire	ctor 616-355 Phone Nu	
Name of Responsible Official (print or type)	Title	Flione No	ambei
200110		4/2/09	
Signature of Responsible Official		Dat	
* Photocopy this form as needed.		EQP 5736	6 (Rev 11-04)

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant:

Opacity

Reporting Period:

01/01/09 - 3/31/09

Company:

Holland Board of Public Works,

Unit Description: #3 Boiler

James De Young Gen. Station

Emission Limit: 20%

Total Source Operating Time: 113,460 minutes

Monitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600720

EM	ISSION DATA SUMMARY <sup>1</sup>	1.
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	 
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems	
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	
3.	(Total duration of EE / Total source operating time ) x 100	0.00 %

CEN	M SYSTEM SUMMARY <sup>1</sup>	
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment	 · · · · · · · · · · · · · · · · · · ·
c.	Quality Assurance Calibration (extra calibrations)	 
d.	Other Known Causes (semi-annual preventive maintenance)	288
e.	Unknown Causes	
2.	Total CEM system downtime	288
3.	(Total CEM system downtime / Total source operating time ) x 100	0.25 %

<sup>&</sup>lt;sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

Comments

I certify that the information contained in this report is true, accurate, and complete.

Signature:

Judy N. Wisscher, Environmental Regulatory Specialist

Date: 04/02/09

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant:

Opacity

Reporting Period:

01/01/09 - 03/31/09

Company:

Holland Board of Public Works,

Unit Description: #4 Boiler

James De Young Gen. Station

Emission Limit: 20%

Total Source Operating Time: 63,252 minutes

Monitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600721

EM	ISSION DATA SUMMARY <sup>1</sup>	
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	24
c.	Control Equipment Problems	
d.	Process Problems:	
e.	Other Known Causes: maintenance performed on precipitator fields	138
f.	Unknown Causes:	
2.	Total duration of EE	162
3.	(Total duration of EE / Total source operating time ) x 100	0.26 %

CE	M SYSTEM SUMMARY <sup>1</sup>	
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes	
e.	Unknown Causes	
2.	Total CEM system downtime	0
3.	(Total CEM system downtime / Total source operating time ) x 100	0.00 %

<sup>&</sup>lt;sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

	I certify that the informati	on contai <del>ned i</del> n this report is tr	rue, accurate, and compl	lete
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Signature:

Judy M. Visscher, Environmental Regulatory Specialist

Date: <u>04/02/09</u>

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant:

Opacity

Reporting Period:

01/01/09 - 03/31/09

Company:

Holland Board of Public Works,

Unit Description: #5 Boiler

James De Young Gen. Station

Emission Limit: 20%

Total Source Operating Time: 72,378 minutes

Monitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600722

EM	ISSION DATA SUMMARY <sup>1</sup>		
1.	Duration of excess emissions (EE) in reporting period due to:		
a.	Startup/Shutdown		
b.	Soot Blowing		
c.	Control Equipment Problems		
d.	Process Problems	 	
e.	Other Known Causes	 	
f.	Unknown Causes		
2.	Total duration of EE		
3.	(Total duration of EE / Total source operating time ) x 100	(	0.00 %

CEN	M SYSTEM SUMMARY <sup>1</sup>	
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes	
e.	Unknown Causes	
2.	Total CEM system downtime	0
3.	(Total CEM system downtime / Total source operating time ) x 100	0.00%

<sup>&</sup>lt;sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

I certify that the information containg	d_in this	report is true,	accurate, and	! compl	ete
---	-----------	-----------------	---------------	---------	-----

Signature:

Judy N. Wisscher, Environmental Regulatory Specialist

Date: 04/02/09



Holland Board of Public Works

July 27, 2009

Certified Mail - Return Receipt Requested

PROPERTY OF
HOLLAND BPW
HOLLAND COPY

625 Hastings Avenue Holland, MI 49423

www.hollandbpw.com

Telephone (616) 355-1520

Facsimile (616) 355-1550 Mr. Steve LaChance

Michigan Department of Environmental Quality

Air Quality Division State Office Building 350 Ottawa NW

Grand Rapids, MI 49503

Dear Mr. LaChance:

Attached are the Excess Emissions Summary Reports and Detail Reports for Units 3, 4, and 5 of the James De Young Generating Station for the 2nd quarter of 2009.

If you have any questions, please do not hesitate to call me at 616-355-1210.

Sincerely,

Judy N. Visscher

Environmental Regulatory Specialist

copy to: Ms. Bonnie Bush, USEPA-Region V (Summary Report only)

Mr. Jon M. Wilford, MDEQ-CSU, Lansing

A Community Owned Utility

Electricity

Water

Waste Treatment





MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

## REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

•					
Source Name HBPW James DeYoung Gen	eration Statio	n & WWTP	County	Ottawa	
Source Address 64 Pine Avenue & 42 S	South River Ave	enue	City Hollar	nd	
AQD Source ID (SRN) B2357	ROP No.	MI-ROP-B2357- 2006a	ROP Se	ection No. 01 & 02	2
lease check the appropriate box(es):					
Annual Compliance Certification (Pursu	ant to Rule 213(4)	(c))			
B C 14 C 15 Lobo datash	F	Т-			
Reporting period (provide inclusive dates):  1. During the entire reporting period, this	From	To	e and conditions	contained in the ROP	each
term and condition of which is identified a method(s) specified in the ROP.	nd included by this	reference. The metho	od(s) used to dete	rmine compliance is/a	re the
2. During the entire reporting period thi term and condition of which is identified deviation report(s). The method used to unless otherwise indicated and described	and included by the determine complia	iis reference, EXCEP <sup>-</sup> nce for each term and	<b>r</b> for the deviation	is identified on the en	ıclosed
☐ Semi-Annual (or More Frequent) Report	Cortification (Du	rought to Pule 213(3)	(c))		
Semi-Annual (or More Frequent) Report	Cerunication (Pu	isualit to Rule 213(3)	(0))		
Reporting period (provide inclusive dates):	From	То		•	
1. During the entire reporting period, AL deviations from these requirements or an	L monitoring and a y other terms or co	ssociated recordkeepi nditions occurred.	ng requirements i	n the ROP were met a	ınd no
2. During the entire reporting period, all deviations from these requirements or an enclosed deviation report(s).	monitoring and ass y other terms or co	ociated recordkeeping nditions occurred, EXC	requirements in t CEPT for the devia	he ROP were met and ations identified on the	i no
Other Report Certification     ■ Control Certific			· · · · · · · · · · · · · · · · · · ·		
Reporting period (provide inclusive dates):	From 4/1/0	09 <b>To</b>	6/30/09		
Additional monitoring reports or other applic		_		cribed:	
Quarterly Excess Emissions and					
					_
				· · · · · · · · · · · · · · · · · · ·	
certify that, based on information and belief supporting enclosures are true, accurate and co		onable inquiry, the sta	itements and info	rmation in this report	and t
David G. Koster		Operations Dire	ctor	616-355-1562	
Name of Responsible Official (print or type)		Title	, , , , , , , , , , , , , , , , , , , ,	Phone Number	
-1.C A 114				7/27/	
Standura of Pagnongible Official				Date	
agriature of responsible Official					

\* Photocopy this form as needed.

EQP 5736 (Rev 11-04)

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant:

Opacity\_

Reporting Period:

04/01/09 - 06/30/09

Company:

Holland Board of Public Works,

Unit Description: #3 Boiler

James De Young Gen. Station

Emission Limit: 20%

Total Source Operating Time: 0 minutes

Monitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600720

EM	ISSION DATA SUMMARY¹	
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems	
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	
3.	(Total duration of EE / Total source operating time ) x 100	0.00 %

CE	M SYSTEM SUMMARY <sup>1</sup>	
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes	
e.	Unknown Causes	
2.	Total CEM system downtime	
3.	(Total CEM system downtime / Total source operating time ) x 100	0.00 %

<sup>&</sup>lt;sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

Comments

I certify that the information contained in this report is true, accurate, and complete.

Signature:

Judy N. Visscher, Environmental Regulatory Specialist

Date: <u>07/24/09</u>

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant:

Opacity

Reporting Period:

04/01/09 - 06/30/09

Company:

Holland Board of Public Works,

Unit Description: #4 Boiler

Emission Limit: 20%

James De Young Gen. Station

Total Source Operating Time: 102,408 minutes

Monitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600721

EM	ISSION DATA SUMMARY <sup>1</sup>	
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	12
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems:	
e.	Other Known Causes: maintenance performed on precipitator fields	
f.	Unknown Causes:	
2.	Total duration of EE	12
3.	(Total duration of EE / Total source operating time ) x 100	0.01%

CE	M SYSTEM SUMMARY <sup>1</sup>	
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	18
d.	Other Known Causes (annual bench calibration of monitor)	786
e.	Unknown Causes	
2.	Total CEM system downtime	804
3.	(Total CEM system downtime / Total source operating time ) x 100	0.79 %

<sup>&</sup>lt;sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

1	certify that the in	formation conto	ined in this report	is true	accurate an	d comple	ete.
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Signature:

Visscher, Environmental Regulatory Specialist

Date: 07/24/09

## AIR QUALITY DIVISION

#### SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant:

Opacity

Reporting Period:

04/01/09 - 06/30/09

Company:

Holland Board of Public Works,

Unit Description: #5 Boiler

James De Young Gen. Station

Emission Limit: 20%

Total Source Operating Time: 46,050 minutes

Monitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600722

EM	IISSION DATA SUMMARY <sup>1</sup>	
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems	
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	0
3.	(Total duration of EE / Total source operating time ) x 100	0.00 %

CE	M SYSTEM SUMMARY <sup>1</sup>	·
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes	
e.	Unknown Causes	
2.	Total CEM system downtime	0
3.	(Total CEM system downtime / Total source operating time ) x 100	0.00%

<sup>&</sup>lt;sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

I certify that the information contained in this report is true, accurate, and complete.

Signature:

Judy M. Visscher, Environmental Regulatory Specialist

Date: <u>07/24/09</u>



Holland Board of Public Works

October 12, 2009

Certified Mail - Return Receipt Requested

625 Hastings Avenue Holland, MI 49423

www.hollandbpw.com

Telephone (616) 355-1520

Facsimile (616) 355-1550 Mr. Steve LaChance

Michigan Department of Environmental Quality

Air Quality Division State Office Building 350 Ottawa NW

Grand Rapids, MI 49503

Dear Mr. LaChance:

Attached are the Excess Emissions Summary Reports and Detail Reports for Units 3, 4, and 5 of the James De Young Generating Station for the 3rd quarter of 2009.

If you have any questions, please do not hesitate to call me at 616-355-1210.

Sincerely,

Judy N. Visscher

Environmental Regulatory Specialist

copy to: Ms. Bonnie Bush, USEPA-Region V (Summary Report only)

Mr. Jon M. Wilford, MDEQ-CSU, Lansing

A Community Owned Utility

Electricity

Water

Waste Treatment





MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

## REPORT CERTIFICATION

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Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division

Source Name HBPW Jam	nes DeYoung Generation	on Station	n & WWTP		County Ottaw	a
Source Address 64 Pine	e Avenue & 42 South	River Ave	enue	City	Holland	
AQD Source ID (SRN) B2	2357	ROP No.	MI-ROP-B2357- 2006a		ROP Section No.	01 & 02
Please check the appropriate	box(es):					
Annual Compliance Ce	ertification (Pursuant to	Rule 213(4)(	(c))			
method(s) specified in  2. During the entire reterm and condition of deviation report(s). The	eporting period, this source which is identified and inclu	e was in comuded by this ce was in colluded by this ine compliant	reference. The methormal mpliance with all term is reference, EXCEPT ice for each term and	d(s) used s and co for the d	I to determine comp nditions contained deviations identified	bliance is/are the in the ROP, each on the enclosed
Semi-Annual (or More	Frequent) Report Certific	cation (Pur	suant to Rule 213(3)	c))		
☐ 2. During the entire re	eporting period, ALL monit requirements or any other eporting period, all monitor requirements or any other	torin <mark>g and as</mark> terms or con ing and asso	ditions occurred.	requirem	ents in the ROP we	ere met and no
	ion					
	e inclusive dates): Fro ports or other applicable do Emissions and Monit		quired by the ROP are	9/30/09 attached		
I certify that, based on informal supporting enclosures are true		after reasor	nable inquiry, the stat	ements a	and information in	this report and the
David G. Koster			Operations Direc	tor		55-1562
Name of Responsible Officia	al (print or type)		Title		Phone	Number
20M					10/15/	Z209
Signature of Responsible Offi	icíal				′ / 1	Date
* Photocopy this form as needed	d.				EQP 5	5736 (Rev 11-04)

## AIR QUALITY DIVISION

#### SUMMARY REPORT

#### GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant:

Opacity

Reporting Period:

07/01/09 - 09/30/09

Company:

Holland Board of Public Works,

James De Young Gen. Station

Unit Description: #3 Boiler

Emission Limit: 20%

Total Source Operating Time: 66,768 minutes

Monitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600720

EM	IISSION DATA SUMMARY <sup>1</sup>	
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems	
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	0
3.	(Total duration of EE / Total source operating time ) x 100	0.00 %

CE	M SYSTEM SUMMARY <sup>1</sup>	
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes (semi-annual preventive maintenance performed on monitor)	174
e.	Unknown Causes	
2.	Total CEM system downtime	174
3.	(Total CEM system downtime / Total source operating time ) x 100	0.26 %

<sup>&</sup>lt;sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

Comments

I certify that the information contained in this report is true, accurate, and complete.

Signature:

Judy N. Visscher, Environmental Regulatory Specialist

Date: 10/12/09

## AIR QUALITY DIVISION

## SUMMARY REPORT

#### GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant:

Opacity

Reporting Period:

<u>07/01/09 – 09/30/09</u>

Company:

Holland Board of Public Works,

Unit Description: #4 Boiler

James De Young Gen. Station

Emission Limit: 20%

Total Source Operating Time: 131,952 minutes

Monitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600721

EM	IISSION DATA SUMMARY <sup>1</sup>	
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems: ash hauling trouble	12
e.	Other Known Causes:	
f.	Unknown Causes:	
2.	Total duration of EE	12
3.	(Total duration of EE / Total source operating time ) x 100	0.01%

CEI	M SYSTEM SUMMARY <sup>1</sup>	
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes (semi-annual preventive maintenance performed on monitor)	210
e.	Unknown Causes	
2.	Total CEM system downtime	210
3.	(Total CEM system downtime / Total source operating time ) x 100	0.16 %

<sup>&</sup>lt;sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

I certify that the information contained in this report is true, accurate, and complete.

Signature:

dyN.)Visscher, Environmental Regulatory Specialist

Date: <u>10/12/09</u>

## AIR QUALITY DIVISION

## SUMMARY REPORT

#### GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant:

Opacity

Reporting Period:

07/01/09 - 09/30/09

Company:

Holland Board of Public Works,

Unit Description: #5 Boiler

James De Young Gen. Station

Emission Limit: 20%

Total Source Operating Time: 132,480 minutes

Monitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600722

EM	ISSION DATA SUMMARY <sup>1</sup>	
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
C.	Control Equipment Problems	
d.	Process Problems (coal feeder problems caused boiler upset)	12
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	12
3.	(Total duration of EE / Total source operating time ) x 100	0.01 %

CEI	M SYSTEM SUMMARY <sup>1</sup>	
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes (performed semi-annual preventive maintenance on monitor)	228
e.	Unknown Causes	
2.	Total CEM system downtime	228
3.	(Total CEM system downtime / Total source operating time ) x 100	0.17%

<sup>&</sup>lt;sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

I certify that the information containe <del>d in</del> this report is true. accurate. an
---

Signature:

Judy M. Visscher, Environmental Regulatory Specialist

Date: 10/12/09



Holland Board of Public Works

January 11, 2010

Certified Mail - Return Receipt Requested

625 Hastings Avenue Holland, MI 49423

www.hollandbpw.com

Telephone (616) 355-1520

Facsimile (616) 355-1550

Mr. Steve LaChance Michigan Department of Environmental Quality Air Quality Division State Office Building 350 Ottawa NW Grand Rapids, MI 49503

Dear Mr. LaChance:

Attached are the Excess Emissions Summary Reports and Detail Reports for Units 3, 4, and 5 of the James De Young Generating Station for the 4<sup>th</sup> quarter of 2009.

PROPERTY OF
HOLLAND BPW
FILE COPY

Per my phone call of today's date, some monitor readings on the Detail Reports are not included in the EE Summary Reports, as they occurred as the only 6-min period that hour above 20% but not more than 27%.

If you have any questions, please do not hesitate to call me at 616-355-1210.

Sincerely,

Judy N. Visscher

Environmental Regulatory Specialist

A Community Owned Utility

copy to: Ms. Bonnie Bush, USEPA-Region V (Summary Report only)

Mr. Jon M. Wilford, MDEQ-CSU, Lansing

Electricity

Water

vvalei

Waste Treatment





MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

## RENEWABLE OPERATING PERMIT REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division

upon request.	•	<b>,</b> ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
Source Name   HBPW James DeYoung Generation Stat.	ion & WWTP	County Ottawa
Source Address 64 Pine Avenue & 42 South River F	venue City	Holland
AQD Source ID (SRN) B2357 ROP No	MI-ROP-B2357- 2006a	ROP Section No01 & 02
Please check the appropriate box(es):		
Annual Compliance Certification (Pursuant to Rule 213)	(4)(c))	
Reporting period (provide inclusive dates): From  1. During the entire reporting period, this source was in conterm and condition of which is identified and included by the method(s) specified in the ROP.	is reference. The method(s) use	ed to determine compliance is/are the
2. During the entire reporting period this source was in term and condition of which is identified and included by deviation report(s). The method used to determine compl unless otherwise indicated and described on the enclosed	this reference, EXCEPT for the iance for each term and condition	deviations identified on the enclosed
Semi-Annual (or More Frequent) Report Certification (F	Pursuant to Rule 213(3)(c))	
Reporting period (provide inclusive dates): From  1. During the entire reporting period, ALL monitoring and deviations from these requirements or any other terms or of the control of the	conditions occurred.	ments in the ROP were met and no
☑ Other Report Certification	· · · · · · · · · · · · · · · · · · ·	
Reporting period (provide inclusive dates): From 10/Additional monitoring reports or other applicable documents  Quarterly Excess Emissions and Monitor Down	required by the ROP are attache	
I certify that, based on information and belief formed after reas supporting enclosures are true, accurate and complete	sonable inquiry, the statements	and information in this report and the
David G. Koster	Operations Director	616-355-1562
Name of Responsible Official (print or type)	Title	Phone Number
1-2 M 100		1/12/2000
Signature of Responsible Official		Date
* Photocopy this form as needed.		EQP 5736 (Rev 11-04)

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant:

Opacity

Reporting Period:

10/01/09 - 12/31/09

Company:

Holland Board of Public Works, James De Young Gen, Station

Unit Description: #3 Boiler

Emission Limit: 20%

Total Source Operating Time: 71,850 minutes

Monitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600720

EM	IISSION DATA SUMMARY <sup>1</sup>	
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems	
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	0
3.	(Total duration of EE / Total source operating time) x 100	0.00 %

CE	M SYSTEM SUMMARY <sup>1</sup>	
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction (transceiver blower motor replaced)	36
b.	Non-Monitor Equipment	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes	
e.	Unknown Causes	
2.	Total CEM system downtime	36
3.	(Total CEM system downtime / Total source operating time ) x 100	0.05 %

<sup>&</sup>lt;sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

Comments

I certify that the information contained in this report is true, accurate, and complete.

Signature:

Judy N. Visscher, Environmental Regulatory Specialist

Date: 1/11/10

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant:

Opacity

Reporting Period:

10/01/09 - 12/31/09

Company:

Holland Board of Public Works,

Unit Description: #4 Boiler

James De Young Gen. Station

Emission Limit: 20%

Total Source Operating Time: <u>102,606 minutes</u>

Monitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600721

EM	ISSION DATA SUMMARY <sup>1</sup>	
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems: fine tuning new precipitator equipment	12
d.	Process Problems: ash hauling trouble	24
e.	Other Known Causes: boiler upset	18
f.	Unknown Causes:	
2.	Total duration of EE	54_
3.	(Total duration of EE / Total source operating time ) x 100	0.05%

CE	M SYSTEM SUMMARY <sup>I</sup>	
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes (annual performance audit performed on monitor)	180
e.	Unknown Causes	
2.	Total CEM system downtime	180
3.	(Total CEM system downtime / Total source operating time ) x 100	0.18 %

<sup>&</sup>lt;sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

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	certify that t	ne ngorma	TON CONCERNE	za m mis	report is in	ie, accuraie	, ana comp	JICIC.

Signature:

Visscher, Environmental Regulatory Specialist

Date: 1/11/10

## AIR QUALITY DIVISION

## SUMMARY REPORT

#### GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant:

**Opacity** 

Reporting Period:

10/01/09 - 12/31/09

Company:

Holland Board of Public Works,

Unit Description: #5 Boiler

James De Young Gen. Station

Emission Limit: 20%

Total Source Operating Time: 37,410 minutes

Monitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600722

EM	ISSION DATA SUMMARY <sup>1</sup>	
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems (coal feeder problems caused boiler upset)	,
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	0
3.	(Total duration of EE / Total source operating time ) x 100	0.00 %

CE	M SYSTEM SUMMARY <sup>I</sup>	
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
C.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes	
e.	Unknown Causes	
2.	Total CEM system downtime	0
3.	(Total CEM system downtime / Total source operating time ) x 100	0.00%

<sup>&</sup>lt;sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

I certify that the information contained in this report is true, accurate, and complete.

Signature:

Judy W. Visscher, Environmental Regulatory Specialist

Date: 1/11/10